

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF RHODE ISLAND

UNITED STATES OF AMERICA

v.

JASON D. BOUDREAU,  
Defendant.

Case No.: 1:15-MJ-399-LDA

MOTION TO CONTINUE AND  
TO EXCLUDE TIME UNDER THE SPEEDY TRIAL ACT

The United States Attorney for the District of Rhode Island, and the Defendant through his counsel, move the Court to continue the time for bringing an information or indictment for a period of 30 days from the operation of the time limit imposed by the Speedy Trial Act. This enlargement of time will permit the parties to pursue plea negotiations.

The reasons for granting this Motion are as follows:

1. The United States and the defendant are engaged in pre-Indictment plea negotiations in this case and desire additional time to address the terms of a plea agreement which may render Indictment and trial in this matter unnecessary.

2. The granting of a continuance will likely conserve judicial resources.

Accordingly, the parties respectfully request that the case be continued for 30 days from January 28, 2016 to February 27, 2016, and that this time period be excluded in computing time under the Speedy Trial Act.

The parties believe that pursuant to 18 U.S.C. § 3161(h), the ends of justice served by granting the continuance outweigh the interests of the public and the defendant in a speedy trial.

Respectfully submitted,

UNITED STATES OF AMERICA  
By its Attorney,

PETER F. NERONHA  
United States Attorney

/s/ Richard W. Rose  
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**CERTIFICATE OF SERVICE**

On the 13th day of January 2016, the United States of America caused the within Motion to Continue and To Exclude Time Under the Speedy Trial Act to be served on the court on:

Olin Thompson, Esq.  
Federal Public Defender's Office  
10 Weybosset Street, Suite 300  
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